TO

DEPARTMENT OF FOOD AND AGRICULTURE

1220 N Street Sacramento, California 95814

June 10, 1996

Mr. Steve Yaeger Program Deputy Director CALFED Ray-Delta Program 1416 Ninth Street, Suite 1155 Sacramento, California 95814

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Dear Mr. Yaeger:

Thank you for the opportunity for the California Department of Food and Agriculture to participate on the Program Coordination Team. It will allow valuable input at the Agency level to express the views of the largest landowner and water use sector in California. We are also participating on the BDAC Water Use Efficiency working group, and plan on attending the Assurance working group meetings as well.

Thank you for the opportunity to comment on the June 5, 1996 draft of the Alternatives and Components of Alternatives documents (the Phase II Alternatives package). We would like to alert you to potential concerns in these drafts before they are released at the 7th CALFED Workshop on June 25th, and the July 19th BDAC meeting.

We still have substantial concerns with the Water Use Efficiency Measures section of the draft. The Implementation Methods section targets 200,000 to 400,000 AF of reduced demand from implementing Efficient Water Management Practices, while the Temporary and Long-Term Land Conversion targets reduced demand of 1 to 2 MAF. These targets should not be explicitly defined numerically at this time. Rather, these strategies should be analyzed in the EIR/EIS from which targets may be established. From that analysis, methods, costs and benefits can be presented. CALFED should acknowledge and incorporate the work of the AB3616 process concerning agricultural efficient water management practices.

Upwards of 50,000 acres of agricultural land is targeted for conversion to wetlands for water quality improvements and for other ecosystem restoration strategies. This is of great concern to the agricultural landowners as to how these actions will be implemented.

We strongly suggest that a fourth, Isolated Conveyance Alternative be presented and fully analyzed in the EIR/EIS. This alternative should present a range of capacity with an upper bound of 20,000 cfs. It should also evaluate different discharge points, both into

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and below the Delta. It should also evaluate several intake scenarios, and include coordinated use with existing or improved in-Delta conveyance.

Finally, the Dual Delta Conveyance Alternative should be expanded to include an upper bound of 20,000 cfs for the isolated conveyance portion of the alternative.

It is our impression that the CALFED process is losing sight of one of its key problem areas; that of water supply reliability, as these conveyance and storage alternatives are presented. We realize that any new facilities will be used to improve water quality and the ecosystem. However, we must not forget that new facilities will be paid for by the water users, who deserve and expect a more reliable water supply.

Sincerely,

Deputy Secretary

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